

# **EXHIBIT**

**25**

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION**

NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE,  
INC., *et al.*,

Plaintiffs,

v.

CITY OF MYRTLE BEACH, *et al.*,

Defendants.

Civil Action No. 4:18-cv-00554-DCC

**DECLARATION OF ALEXANDRA STEWART**

I, Alexandra Stewart, hereby state as follows:

1. I am over the age of eighteen and am competent to make this Declaration. I have personal knowledge of the matters set forth herein.

2. I am African American. I am a 25 year resident of Myrtle Beach, SC.

3. I have attended Black Bike Week every year since 2007.

4. Since 2015, the City of Myrtle Beach has implemented a one way traffic pattern on Ocean Blvd. on the Friday, Saturday and Sunday of Black Bike Week. I have seen and experienced how this traffic loop creates extreme traffic conditions, turning the drive down the length of Ocean Blvd. into a 2-2.5 hour journey.

5. Since 2015, the City of Myrtle Beach has implemented a 23-mile traffic loop that takes effect after 10:00 pm on the Friday and Saturday of Black Bike Week. I have seen and experienced how the 23 mile traffic loop creates extreme traffic conditions. As a result of the traffic loop, trips that would normally take under 30 minutes take a more than 4 hours to complete.

6. On Friday night of Black Bike Week 2017, I attended an event in Atlantic Beach, South Carolina at a location called the Compound. The traffic loop began before the event ended. In order to avoid getting stuck in the loop on my way home to Myrtle Beach, I was forced to stay in Atlantic Beach until 3:00 am.

7. On Saturday night of Black Bike Week 2017, I attended events in Cherry Grove, South Carolina and Atlantic Beach, South Carolina. The traffic loop began before the events ended. In order to avoid getting trapped in the loop on my way home to Myrtle Beach, I was forced to stay in Cherry Grove until 3:00am.

8. Beginning in 2015, Black Bike Week festivities have been characterized by an overwhelming police presence. For example, in 2015, 2016, and 2017, the one way traffic pattern on Ocean Blvd. gridlocks traffic. Because there are little to no opportunities to turn off of Ocean Blvd., traffic is essentially locked into the one way traffic pattern on Ocean Blvd. During all three years, I've witnessed groups of 4-5 police officers on bicycles on Ocean Blvd. The bicycle officers ride along-side of the stopped traffic and use the captured traffic as an opportunity to peer into Black Bike Week tourists' vehicles. The officers usually ride on both sides of the vehicles on Ocean Blvd. As a Myrtle Beach resident, I never see this kind of activity during Harley Week.

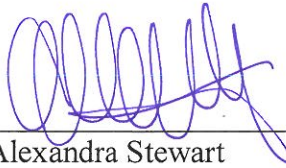
9. The police responses during Black Bike Week in 2015, 2016, and 2017 were much more aggressive than police responses during other times of the year. I witnessed as many as ten to fifteen officers respond to a minor traffic stop during Black Bike Week, something that would never occur during other times of the year. The aggressive policing tactics create an atmosphere of constant surveillance of African-American tourists during Black Bike Week.

10. I feel that the police presence and the traffic pattern during Black Bike Week are intended to make African-American tourists feel so uncomfortable that they will not return to Black Bike Week or Myrtle Beach in the future. As an African-American resident of Myrtle Beach, the police presence and traffic pattern implemented during Black Bike Week make me feel like the City of Myrtle Beach does not value me, my family, or my community.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED WITHIN THE UNITED STATES ON: April <sup>6<sup>th</sup></sup>, 2018.

BY:

  
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Alexandra Stewart